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April 29, 2022

VIA ECF

Honorable Jose R. Almonte
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Zeo Health, Ltd., et al. v. Zoi Global, LLC, et al.
United States District Court, District of New Jersey, Case No.: 2:21-cv-11410-ES-M

Dear Judge Almonte:

Undersigned counselors represent Defendants, Nikolaos Tsirikos-Karapanos, M.D., PhD, PharmD and Metron Nutraceuticals, LLC (collectively, “Metron”), in the above-captioned matter. Metron respectfully brings to the Court’s attention that Metron’s Motion to Dismiss filed September 3, 2021 remains pending and is fully briefed. If Metron remains in this matter, it will then be time for Metron to file both an answer and any affirmative claims. This will likely impact discovery.

Further, Plaintiffs just recently served first named co-Defendant Zoi Global, LLC, as well as, co-defendant Denise Stephens. Undersigned has discussed discovery and deadlines with Plaintiffs’ counsel. While Plaintiffs’ counsel advised Metron Attorney Ryan Rubin that Plaintiffs are not opposed to some additional but short extensions of time on discovery, undersigned anticipates that more of a global restructuring of the schedule in this matter will be necessary due to Plaintiffs’ delay/difficulty in serving all parties.

If Metron’s Motion to Dismiss is not granted and assuming that the newly served co-Defendants are represented by counsel, undersigned requests that the May 26, 2022 Status Conference serve as an opportunity to discuss modifying dates and deadlines in this matter.

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Very truly yours,

/s/ Ryan Rubin/Brian Deeney

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LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: All Counsel of Record via ECF